

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOARDS OF TRUSTEES OF THE
CEMENT MASONS & PLASTERERS
HEALTH & WELFARE TRUST, *et al.*,

Plaintiffs,

v.

KELAYE CONCRETE LLC, a
Washington limited liability company,
UBI No. 603213162, Contractor's
License No. KELAYCL876K2,

Defendant.

NO. 2:15-cv-01866-RAJ

**PLAINTIFF TRUSTS' RESPONSE TO
ORDER TO SHOW CAUSE**

Plaintiffs Boards of Trustees provides this response to the Court's Show Cause Order at Dkt.3.

The plaintiffs served the employer, Kelaye Concrete, LLC ("Kelaye"), on December 4, 2015 (*see* Dkt. No 4). The plaintiffs have not sought a default because that they have been trying to work with Kelaye and its attorney to resolve this case. See Exhibit A to the Declaration of Noelle Dwarzski.

1 The plaintiffs apologize for any inconvenience this may have caused the Court. The
2 plaintiffs intend to fully prosecute this case.

3
4 DATED THIS 9th day of March, 2016.

5 s/ Noelle E. Dwarzski
6 Noelle E. Dwarzski, WSBA # 40041
7 McKENZIE ROTHWELL BARLOW
8 & COUGHRAN, P.S.
9 Attorneys for Plaintiff Trusts
10 1325 Fourth Ave., Suite 910
11 Seattle, WA 98101

12 CERTIFICATE OF SERVICE

13 I hereby certify under penalty of perjury under the laws of the State of Washington
14 that on this 9th day of March, 2016 I electronically filed the foregoing with the Clerk of the
15 Court using the CM/ECF system which will send notification to all parties registered with
16 CM/ECF in this matter. Defendant Kelaye Concrete, LLC has not yet appeared in the suit.

17 Dated this 9th day of March, 2016, at Seattle, Washington.

18 /s/ Noelle E. Dwarzski
19 Noelle E. Dwarzski WSBA No. 40041
20 McKENZIE ROTHWELL BARLOW
21 & COUGHRAN, P.S.
22 Attorneys for Plaintiffs